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13				
14	UNITED STATES DISTRICT COURT			
15	NORTHERN DISTRICT OF CALIFORNIA			
16	HASTINGS COLLEGE OF THE LAW, a public trust and institution of higher education	Case No. 4:20-cv-303	33-JST	
17	duly organized under the laws and the Constitution of the State of California;		F MARK MAZZA IN ENDANT CITY AND	
18	FALLON VICTORIA, an individual; RENE	COUNTY OF SAN	FRANCISCO'S	
19	DENIS, an individual; TENDERLOIN MERCHANTS AND PROPERTY		PLAINTIFFS' MOTION TO LATED INJUNCTION	
20	ASSOCIATION, a business association; RANDY HUGHES, an individual; and	Hearing Date:	May 23, 2024	
21	KRISTEN VILLALOBOS, an individual,	Time: Place:	2:00 p.m. Hon. Jon S. Tigar	
22	Plaintiffs,		Oakland Courthouse Courtroom 6 – 2nd Floor	
23	VS.		1301 Clay Street Oakland, CA 94612	
	CITY AND COUNTY OF SAN	T. I.D.	•	
24	FRANCISCO, a municipal entity,	Trial Date:	Not Set	
25	Defendant.			
26		_		
27				

DECL. MAZZA ISO OPP. TO MOT. ENFORCE PI CASE NO. 4:20-cv-3033 JST

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I, Mark Mazza, declare:

1. I have personal knowledge of the matters stated herein, and if called and sworn as a witness could and would competently testify thereto.

I. Background and Professional Experience

- 2. I have more than two decades of work experience in the field of social work.
- 3. I currently work for the Department of Emergency Management ("DEM") as the Tenderloin Street Operations Manager. My job duties include managing the Joint Field Operation ("JFO") described in more detail below.
- 4. I worked in various capacities for the Department of Homelessness and Supportive Housing ("HSH") beginning in May 2016 before joining DEM. From January 2020 through August 2020 I was the interim Outreach Manager at HSH. In August 2020 until October 2022, I was promoted to Outreach Manager.
- 5. Before joining HSH in May 2016, I worked for San Francisco's Department of Public Health ("DPH") from March 2013 until May of 2016.
- 6. Before joining DPH in 2013, I worked twelve years as a counselor, therapist, and behavioral health specialist at nonprofits and schools.
- 7. I received a Master's Degree in social work in 2006 from Virginia Commonwealth University.

II. Joint Field Operations ("JFO")

- 8. Joint Field Operations ("JFO") is an interagency street response specifically offered in the Tenderloin that operates seven days a week. JFO is not a City-wide program.
- 9. San Francisco initiated JFO in January 2022. The program supports individuals experiencing homelessness or struggling with substance use disorders to access resources and treatment with a continuing component of street cleaning. It also makes offers of shelter.
- 10. JFO divides the Tenderloin into four quadrants and focuses on a different quadrant each day.

- 11. JFO operates from 9AM to 1PM and can be staffed by personnel from the Fire Department, HSH, DEM, DPH, Department of Public Works, Police Department, and the Municipal Transportation Agency.
- 12. A typical interaction involves a community paramedic acting as a field incident commander; two homeless outreach team workers, to provide outreach and service linkage to resources for any combination of substance use, mental health, and physical health needs; one to two San Francisco Police Department officers to protect the safety of the City's outreach workers; two parking control officers to control traffic for the safety of the unhoused, City personnel, and bystanders; and two to ten public works personnel to perform street cleaning.
- 13. In addition to the ongoing collaboration among city departments, JFO has forged working relationships with several Community Benefit District ("CBD") organizations. CBDs, also known as Business Improvement Districts, are a public-private partnership to fund improvements and get customized support in select neighborhoods in San Francisco. CBDs share updates and concerns regarding street conditions with JFO.
- 14. Every morning, JFO personnel meet at the designated meeting point for the quadrant scheduled for service that day. JFO does not cover the entire quadrant. Instead, from the meeting point, JFO will address two to three locations within the quadrant to offer wellness checks, referrals to substance use programs and medical and mental health care resources to unhoused individuals, and perform street cleaning.
- 15. DEM started collecting data on JFO on May 24, 2023. Prior to that JFO data was collected by various other City departments. In my role with DEM, I am familiar with the JFO data DEM collects and rely on that data as part of its work.
- 16. From May 24, 2023 through April 2, 2024, JFO went out into the field 245 days and conducted 549 operations. Those operations led to 4,719 shelter offers. The City cannot force someone to accept shelter, and during the same time period JFO made 371 shelter linkages. It also faciliated medical transport for 24 times.

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17. I am proud of JFO's work to support San Francisco's homeless community and to reduce the City's tent count and based on my experience believe the City makes more than reasonable efforts to reduce the tent count.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed April 4, 2024 in San Francisco, California.

Mark Mazza MARK MAZZA